

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

LOGAN PAUL,

Plaintiff,

v.

STEPHEN FINDEISEN AND COFFEE BREAK
PRODUCTIONS LLC D/B/A COFFEEZILLA,

Defendants.

Civil Action No. 5:24-cv-00717

**DECLARATION OF ANDREW C. PHILLIPS ACCOMPANYING PLAINTIFF'S
REPLY IN SUPPORT OF HIS MOTION TO COMPEL PRODUCTION OF
COMMUNICATIONS TO AND FROM HARRY BAGG AND/OR ED LESZCZYNSKI**

I, Andrew C. Phillips, declare as follows

1. I am an attorney admitted, *pro hac vice*, to practice in this Court, and I am one of the lawyers responsible for representing Plaintiff Logan Paul in this action. I submit this declaration in support of Mr. Paul's Reply in Support of Motion to Compel Production of Communications to and from Harry Bagg and/or Ed Leszczynski. The following facts are within my personal knowledge and, if called and sworn as a witness, I would testify competently as to them.

2. On August 15, 2025, Defendants served Mr. Paul with their Fifth Amended Privilege Log of Text Messages, which is attached as Exhibit 1 to this Declaration.

3. On or about May 21, 2025, in order to resolve a different motion to compel, the parties agreed to parameters for a third-party discovery review. The parties memorialized those parameters in the Memorandum Re: Paul v. Findeisen et al. Document Review that is attached as Exhibit 2 to this Declaration.

4. At no point in this litigation did Mr. Paul or any of his representatives agree that the third-party discovery review precluded or limited Mr. Paul's ability to seek other evidence of actual malice.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on August 20, 2025

/s/ Andrew C. Phillips
Andrew C. Phillips